



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We make Indiana a cleaner, healthier place to live.*

Joseph E. Kernan  
Governor

Lori F. Kaplan  
Commissioner

September 25, 2003

100 North Senate Avenue  
P.O. Box 6015  
Indianapolis, Indiana 46206-6015  
(317) 232-8603  
(800) 451-6027  
[www.in.gov/idem](http://www.in.gov/idem)

TO: Interested Parties / Applicant

RE: Citgo Petroleum Corporation / 069-18115-00004

FROM: Paul Dubenetzky  
Chief, Permits Branch  
Office of Air Quality

## Notice of Decision – Approval

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to 326 IAC 2, this approval was effective immediately upon submittal of the application.

If you wish to challenge this decision, IC 4-21.5-3-7 requires that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar days from the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for considerations at any hearing; and
- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosures  
FNPER-AM.dot 9/16/03

September 26, 2003

Mr. Jon Colbert  
Citgo Petroleum Corporation  
4393 North Meridian Street  
Huntington, IN 46750

Re: 069-18115  
Second Administrative Amendment to  
FESOP No.: 069-7564-00004

Dear Mr. Colbert:

Citgo Petroleum Corporation was issued a FESOP on June 12, 1998, for a stationary bulk petroleum product storage and transfer terminal. A letter requesting an administrative amendment was received on September 8, 2003. Pursuant to the provisions of 326 IAC 2-8-10(a)(6) and (14) the permit is hereby administratively amended as follows (~~strikeout~~ to show deletions and **bold** to show additions):

(1) The facility description in Section A.2 is amended as follows:

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

This stationary source consists of the following emission units and pollution control devices:

- (a) one (1) internal floating roof gasoline storage tank (ID Tank No. 1), with a maximum capacity of 3,150,000 gallons, exhausting at one emission point identified as TK-1 (constructed in 1963);
- (b) one (1) ~~external~~ **internal** floating roof gasoline (or distillate) storage tank (ID Tank No. 2), with a maximum capacity of 1,050,000 gallons, exhausting at one emission point identified as TK-2 (constructed in 1963);
- (c) one (1) fixed coned roof distillate storage tank (ID Tank No. 3), with a maximum capacity of 1,470,000 gallons, exhausting at one emission point identified as TK-3 (constructed in 1963);
- (d) one (1) internal floating roof gasoline (or distillate) storage tank (ID Tank No. 4), with a maximum capacity of 1,050,000 gallons, exhausting at one emission point identified as TK-4 (constructed in 1963);
- (e) one (1) fixed coned roof ethanol storage tank (ID Tank No. 5), with a maximum capacity of 42,000 gallons, exhausting at one emission point identified as TK-5 (constructed in 1963);
- (f) one (1) internal floating roof gasoline storage tank (ID Tank No. 6), with a maximum capacity of 2,310,000 gallons, exhausting at one emission point identified as TK-6 (constructed in 1977);

- (g) one (1) fixed coned roof ~~additive~~ **ethanol** storage tank (ID Tank No. 7), with a maximum capacity of 30,000 gallons, exhausting at one emission point identified as TK-7 (constructed in 1981);
- (h) ~~One (1) internal floating roof ethanol storage tank, identified as TK-8, with a maximum capacity of 150,000 gallons, exhausting at one (1) emission point identified as TK-8 (to be constructed in 2003);~~
- (i-h) one (1) tank truck loading rack (ID No. LR1) used to load gasoline, distillate, ethanol, and additive, with two loading bays each equipped with ~~eight~~ **nine** bottom loading arms, controlled by one (1) enclosed flame hydrocarbon Vapor Combustion Unit (VCU), exhausting through one (1) stack identified as VCU and including fugitive emissions based on capture efficiency identified as LRFUG (constructed in 1987); and
- ~~(j) one (1) packed tower air stripper (ID No. AIR1) used for removal of volatile organic compounds (VOCs) from contaminated water drawn of the bottom of petroleum storage tanks, rated at a maximum of 25 gallons per minute, exhausting through one (1) stack identified as STRP-1 (constructed in 1992).~~

(2) The description of insignificant activities is amended as follows:

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Propane or liquified petroleum gas, or butane-fired combustion sources with heat input equal to or less than six million (6,000,000) Btu per hour.
- (b) Fuel oil-fired combustion sources with heat input equal to or less than two million (2,000,000) Btu per hour and firing fuel containing less than five-tenths (0.5) percent sulfur by weight. ~~including:~~
  - ~~(1) one (1) distillate fuel oil-fired furnace, rated at 2.0 million (MM) British thermal units (Btu) per hour, used to operate the heating and cooling system for the small office building onsite.~~
- (c) VOC and HAP storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons including:
  - ~~(1) one (1) 1,000 gallon distillate fuel oil underground storage tank for the furnace; and~~
  - (1) two (2) 1,000 gallon Amoco gasoline additive tanks;**
  - (2) One (1) 1,000 gallon pour back tank; and**
  - ~~(2 3)~~ **one (1) 500 1,000 gallon slop tank containing distillate.**

.....

(f) **Emission units with potential emissions below exemption levels as specified in 326 IAC 2-1.1-3:**

Citgo Petroleum-Huntington Terminal  
Huntington, Indiana

Page 3 of 4  
AA 069-18115-00004

- (1) **one (1) 2,000 gallon premium diesel additive tank;**
- (2) **one (1) horizontal cone roof gasoline additive storage tank, with a maximum capacity of 10,000 gallons, exhausting at one (1) emission point identified as TK-8.**

(3) The facility description in Section D.1 is amended as follows:

- (a) one (1) internal floating roof gasoline storage tank (ID Tank No. 1), with a maximum capacity of 3,150,000 gallons, exhausting at one emission point identified as TK-1 (constructed in 1963);
- (b) one (1) ~~external~~ **internal** floating roof gasoline (or distillate) storage tank (ID Tank No. 2), with a maximum capacity of 1,050,000 gallons, exhausting at one emission point identified as TK-2 (constructed in 1963);
- (c) one (1) fixed coned roof distillate storage tank (ID Tank No. 3), with a maximum capacity of 1,470,000 gallons, exhausting at one emission point identified as TK-3 (constructed in 1963);
- .....
- (g) one (1) fixed coned roof ~~additive~~ **ethanol** storage tank (ID Tank No. 7), with a maximum capacity of 30,000 gallons, exhausting at one emission point identified as TK-7 (constructed in 1981);

(4) Section D.3, which included the air stripper identified as AIR1, which has now been removed, is deleted from the permit.

(5) The Table of Contents is amended as follows:

~~SECTION D.3 FACILITY OPERATION CONDITIONS~~

~~Air Stripper 33~~

~~Emission Limitations and Standards [326 IAC 2-8-4(1)]~~

~~D.3.1 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs)  
[326 IAC 2-8-4(1)] 33~~

~~Compliance Determination Requirements~~

~~D.3.2 Testing Requirements [326 IAC 2-8-5(1)] 33~~

~~Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]~~

~~D.3.3 Record Keeping Requirements 33~~

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Madhurima D. Moulik, at (800) 451-6027, press 0 extension 3-0868, or dial (317) 233-0868.

Sincerely,  
Original signed by

Paul Dubenetzky, Chief  
Permits Branch  
Office of Air Quality

Attachments

mm

cc: File – Huntington County  
U.S. EPA, Region V  
Huntington County Health Department  
Air Compliance Section Inspector – Ryan Hillman  
Compliance Data Section - Karen Nowak  
Administrative and Development  
Technical Support and Modeling - Michele Boner

**FEDERALLY ENFORCEABLE STATE  
OPERATING PERMIT (FESOP)  
OFFICE OF AIR QUALITY**

**CITGO Petroleum Corporation - Huntington Terminal  
4393 North Meridian Road  
Huntington, Indiana 46750**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 and 326 IAC 2-1-3.2, as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F069-7564-00004	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date:

1<sup>st</sup> Administrative Amendment No.: 069-16476

Issued on: April 30, 2003

2 <sup>nd</sup> Administrative Amendment No.: 069-18115	Pages Modified: 4, 5, 6, 25, 33
Issued by:Original signed by Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date:September 25, 2003

<b>Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]</b>	
D.2.8 Volatile Organic Compounds (VOC)	30
D.2.9 Daily Visible Checks for Liquid Leaks	30
 Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]	
D.2.10 Record Keeping Requirements	31
D.2.11 Reporting Requirements	32
 <b>Certification Form</b>	<b>34</b>
<b>Emergency/Deviation Form</b>	<b>35</b>
<b>Quarterly Report Forms</b>	<b>37-40</b>
<b>Quarterly Compliance Report Form</b>	<b>41</b>

## SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) and presented in the permit application.

### A.1 General Information [326 IAC 2-8-3(b)]

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The Permittee owns and operates a stationary bulk petroleum product storage and transfer terminal.

Responsible Official: Knoris Holloway, Terminal Manager  
Source Address: 4393 North Meridian Road, Huntington, Indiana 46750  
Mailing Address: 4393 North Meridian Road, Huntington, Indiana 46750  
SIC Code: 5171  
County Location: Huntington County  
County Status: Attainment for all criteria pollutants  
Source Status: Federally Enforceable State Operating Permit (FESOP)  
Minor Source, under PSD Rules;

### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

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This stationary source consists of the following emission units and pollution control devices:

- (a) one (1) internal floating roof gasoline storage tank (ID Tank No. 1), with a maximum capacity of 3,150,000 gallons, exhausting at one emission point identified as TK-1 (constructed in 1963);
- (b) one (1) internal floating roof gasoline (or distillate) storage tank (ID Tank No. 2), with a maximum capacity of 1,050,000 gallons, exhausting at one emission point identified as TK-2 (constructed in 1963);
- (c) one (1) fixed coned roof distillate storage tank (ID Tank No. 3), with a maximum capacity of 1,470,000 gallons, exhausting at one emission point identified as TK-3 (constructed in 1963);
- (d) one (1) internal floating roof gasoline (or distillate) storage tank (ID Tank No. 4), with a maximum capacity of 1,050,000 gallons, exhausting at one emission point identified as TK-4 (constructed in 1963);
- (e) one (1) fixed coned roof ethanol storage tank (ID Tank No. 5), with a maximum capacity of 42,000 gallons, exhausting at one emission point identified as TK-5 (constructed in 1963);
- (f) one (1) internal floating roof gasoline storage tank (ID Tank No. 6), with a maximum capacity of 2,310,000 gallons, exhausting at one emission point identified as TK-6 (constructed in 1977);
- (g) one (1) fixed coned roof ethanol storage tank (ID Tank No. 7), with a maximum capacity of 30,000 gallons, exhausting at one emission point identified as TK-7 (constructed in 1981);
- (h) one (1) tank truck loading rack (ID No. LR1) used to load gasoline, distillate, ethanol, and additive, with two loading bays each equipped with eight bottom loading arms, controlled by one (1) enclosed flame hydrocarbon Vapor Combustion Unit (VCU), exhausting through one (1) stack identified as VCU and including fugitive emissions based on capture efficiency identified as LRFUG (constructed in 1987).

**A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]**

---

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Propane or liquified petroleum gas, or butane-fired combustion sources with heat input equal to or less than six million (6,000,000) Btu per hour.
- (b) Fuel oil-fired combustion sources with heat input equal to or less than two million (2,000,000) Btu per hour and firing fuel containing less than five-tenths (0.5) percent sulfur by weight including:
- (c) VOC and HAP storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons including:
  - (1) two (2) 1,000 gallon Amoco gasoline additive tanks;
  - (2) one (1) 1,000 gallon pour back tank; and
  - (3) one (1) 1,000 gallon slop tank containing distillate.
- (d) Paved and unpaved roads and parking lots with public access.
- (e) Fugitive VOC emissions from pumps, valves, flanges, etc.
- (f) Emission units with potential emissions below exemption levels as specified in 326 IAC 2-1.1-3:
  - (1) one (1) 2,000 gallon premium diesel additive tank;
  - (2) one (1) horizontal cone roof gasoline additive storage tank, with a maximum capacity of 10,000 gallons, exhausting at one (1) emission point identified as TK-8.

**A.4 FESOP Applicability [326 IAC 2-8-2]**

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This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) for a Federally Enforceable State Operating Permit (FESOP).

**A.5 Prior Permit Conditions Superseded [326 IAC 2]**

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The terms and conditions of this permit incorporate all the current applicable requirements for all emission units located at this source and supersede all terms and conditions in all registrations and permits, including construction permits, issued prior to the date of issuance of this permit. All terms and conditions in such registrations and permits are no longer in effect.

## SECTION D.1

## FACILITY OPERATION CONDITIONS

- (a) one (1) internal floating roof gasoline storage tank (ID Tank No. 1), with a maximum capacity of 3,150,000 gallons, exhausting at one emission point identified as TK-1 (constructed in 1963);
- (b) one (1) internal floating roof gasoline (or distillate) storage tank (ID Tank No. 2), with a maximum capacity of 1,050,000 gallons, exhausting at one emission point identified as TK-2 (constructed in 1963);
- (c) one (1) fixed coned roof distillate storage tank (ID Tank No. 3), with a maximum capacity of 1,470,000 gallons, exhausting at one emission point identified as TK-3 (constructed in 1963);
- (d) one (1) internal floating roof gasoline (or distillate) storage tank (ID Tank No. 4), with a maximum capacity of 1,050,000 gallons, exhausting at one emission point identified as TK-4 (constructed in 1963);
- (e) one (1) fixed coned roof ethanol storage tank (ID Tank No. 5), with a maximum capacity of 42,000 gallons, exhausting at one emission point identified as TK-5 (constructed in 1963);
- (f) one (1) internal floating roof gasoline storage tank (ID Tank No. 6), with a maximum capacity of 2,310,000 gallons, exhausting at one emission point identified as TK-6 (constructed in 1977);
- (g) one (1) fixed coned roof ethanol storage tank (ID Tank No. 7), with a maximum capacity of 30,000 gallons, exhausting at one emission point identified as TK-7 (constructed in 1981).

## Emission Limitations and Standards [326 IAC 2-8-4(1)]

### D.1.1 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs) [326 IAC 2-8-4(1)]

- (a) Pursuant to Operation Permit CP 35-05-90-0140, issued January 30, 1987, and Amendment to Operation Permit CP 35-05-90-0140, issued October 31, 1995, the total throughputs of gasoline, distillate, ethanol, and additive to the storage tanks at the source shall each be limited to:
  - (i) 172,982,000 gallons of gasoline,
  - (ii) 150,000,000 gallons of distillates,
  - (iii) 17,298,200 gallons of ethanol, and
  - (iv) 17,298,200 gallons of additive per twelve (12) month period, rolled on a monthly basis.
- (b) The above throughput limits shall limit the total potential to emit of volatile organic compounds (VOC), single HAP, and total HAP emissions from the storage tanks to 24.0, 2.6, and 3.9 tons per year, respectively, such that source wide emissions of VOC, worst case single HAP, and total HAPs are limited to less than 100, 10, and 25 tons per twelve (12) month period, rolled on a monthly basis, respectively. Therefore, the requirements of 326 IAC 2-7 and 40 CFR Part 63.420, Subpart R, National Emission Standards for Gasoline Terminals and Pipeline Breakout Stations, do not apply.

### D.1.2 Petroleum Liquid Storage Vessel [326 IAC 12][40 CFR 60.110, Subpart K]

Pursuant to 40 CFR 60.110, Subpart K, the gasoline storage tank, identified as Tank No. 6, shall be equipped with a floating roof, a vapor recovery system, or their equivalents if the true vapor pressure of the petroleum liquid, as stored, is equal to or greater than 78 mm Hg (1.5 psia) but not greater than 570 mm Hg (11.1 psia).

### D.1.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

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## Indiana Department of Environmental Management Office of Air Quality

### Technical Support Document (TSD) for a Minor Permit Revision to a Federally Enforceable State Operating Permit

#### Source Background and Description

<b>Source Name:</b>	<b>(Source name)</b>
<b>Source Location:</b>	<b>(include no., street, city, state, zip code)</b>
<b>County:</b>	<b>(County name)</b>
<b>SIC Code:</b>	<b>(SIC Numbers)</b>
<b>Operation Permit No.:</b>	<b>000-00000-00000</b>
<b>Operation Permit Issuance Date:</b>	<b>(month, day, year)</b>
<b>Permit Revision No.:</b>	<b>000-00000</b>
<b>Permit Reviewer:</b>	<b>(Reviewer's Name)</b>

The Office of Air Quality (OAQ) has reviewed a revision application from **(source name)** relating to the operation of **(source description)**.

#### History

**(example)**  
**(Source Name)** was issued a FESOP on **(date)**. On **(date)**, an application was submitted to OAQ to **(describe the change)**.

#### Justification for the Revision

The FESOP is being modified through a (Minor or Significant) Permit Revision. This revision is being performed pursuant to 326 IAC **(please use the rule cite which most closely matches the category of the revision you are using, e.g. 2-8-11.1(d)(3), and quote the rule in part or in total)**.

#### Existing Approvals

The source was issued a FESOP **(000-00000-00000)** on **(date)**. The source has since received the following:

- (example)**
- (a) First Administrative Amendment No. **000-00000** issued on **(date)**; and
  - (b) First Minor Permit Revision No. **000-00000** issued on **(date)**.

#### Source Definition

**(include the Source Definition section if applicable)**

**(Use the following language if a source consists of two (2) or more plants)**

This **(source description)** company consists of two (2) plants:

- (a) Plant 1 is located at **(street address, city, state)**; and
- (b) Plant 2 is located at **(street address, city, state)**.

Since the two (2) plants are located in contiguous properties, have the same SIC codes and are owned by one (1) company, they will be considered one (1) source.

**(Use the following language if the source has an on-site contractor)**

This **(source description)** consists of a source with **(an)** on-site contractor**(s)**:

- (a) Plant 1 **(Company name)**, the primary operation, is located at **(street address, city, state)**; and
- (b) Plant 2 **(Contractor name)**, the supporting operation, is located at **(street address, city, state)**.

IDEM has determined that Plant 1 **(Company name)** and Plant 2 **(Contractor name)** are under the common control of **(Company name)**. These two plants are considered one source due to contractual control. Therefore, the term "source" in the FESOP documents refers to both **(Company name)** and **(Contractor name)** as one source.

**(Add the following, if applicable)**

Separate FESOPs will be issued to **(Company name)** and **(Contractor name)** solely for administrative purposes.

**Air Pollution Control Justification as an Integral Part of the Process**

**(Use the following section if the source has submitted information stating that the control equipment is an integral part of the process)**

The company has submitted the following justification such that the **(air pollution control equipment, i.e. baghouse, afterburner)** be considered as an integral part of the **(process)**:

- (a) **Specify the important points of the justification.**
- (b)

IDEM, OAQ has evaluated the justifications and agreed that the **(air pollution control equipment)** will be considered as an integral part of the **(process)**. Therefore, the permitting level will be determined using the potential to emit after the **(air pollution control equipment)**. Operating conditions in the proposed permit will specify that this **(air pollution control equipment)** shall operate at all times when the **(process)** is in operation.

**or**

IDEM, OAQ has evaluated the justifications and determined that the **(air pollution control equipment)** will not be considered as an integral part of the **(process)**. Therefore, the permitting level will be determined using the potential to emit before the **(air pollution control equipment)**.

**Enforcement Issue**

**(Choose all that apply to the source from the options below)**

**(Use the following for CWOP and/or OWOP facilities)**

- (a) IDEM is aware that equipment has been constructed **(and/or operated)** prior to receipt of the proper permit. The subject equipment is listed in this Technical Support Document under the condition entitled "Unpermitted Emission Units and Pollution Control Equipment".
- (b) IDEM is reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the construction permit rules.

**(Use the following for facilities that are not in compliance with an emission limitation or standard)**

- (a) IDEM is aware that the **(process)** is not in compliance with the following emission limitation:

**(example)**

- (1) 326 IAC 8-2-9 (Miscellaneous Metal Coating)  
Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating applied to the metal trailer shall be limited to 3.5 pounds of VOC per gallon of coating less water for forced warm air dried coatings.
- (b) IDEM is reviewing this matter and has taken appropriate action. The compliance schedule in this proposed permit will satisfy the requirements of the above stated requirement.

**(Use the following for sources with enforcement action pending)**

The source has the following enforcement actions **(e.g. Notices of Violation (NOVs), Agreed Orders)** pending:

(1) **Briefly describe the pending action.**

**(Use the following for sources with no pending enforcement actions)**

There are no enforcement actions pending.

### Stack Summary

Stack ID	Operation	Height (ft)	Diameter (ft)	Flow Rate (acfm)	Temperature (°F)

(delete rows not needed)

### Recommendation

The staff recommends to the Commissioner that the **(Minor or Significant)** Permit Revision be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

**(choose one)**

A complete application for the purposes of this review was received on **(date)**.

**or**

An application for the purposes of this review was received on **(date)**, with additional information received on **(date)**.

### Emission Calculations

**(If Emission Calculations are necessary, choose one of the following)**

See Appendix A of this document for detailed emission calculations **(specify the page numbers in Appendix A, i.e. pages 15 through 18)**

**or**

The calculations submitted by the applicant have been verified and found to be accurate and correct. These calculations are provided in Appendix A of this document **(specify the page numbers in Appendix A, i.e. pages 15 through 18)**.

### Potential to Emit of the Revision Before Controls

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U.S. EPA, the department, or the appropriate local air pollution control agency."

**(For each pollutant below, record the potential to emit)**

Pollutant	Potential to Emit (tons/yr)
PM	
PM-10	
SO <sub>2</sub>	
VOC	
CO	

NO <sub>x</sub>	
-----------------	--

**(If the source has HAP emissions, specify the HAPs below and record the PTE)**

HAPs	Potential to Emit (tons/yr)
Specify the HAP	
Total	

**(Choose those of the following that are applicable to the revision)**

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of pollutants are equal to or greater than 25 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-8-11.1(f).
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of pollutants are less than 25 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-8-11.1(d).
- (c) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is less **(equal to or greater)** than ten (10) tons per year and/or the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is less **(equal to or greater)** than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-8-11.1(d or f).

**and/or**

**(Use the following condition if applicable)**

- (d) Fugitive Emissions  
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

### County Attainment Status

The source is located in **(county name)** County.

Pollutant	Status <b>(attainment, maintenance attainment, or unclassifiable; severe, moderate, or marginal nonattainment)</b>
PM-10	
SO <sub>2</sub>	
NO <sub>2</sub>	
Ozone	
CO	
Lead	

**(Choose if the source is located in an attainment county)**

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. **(Name)** County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.
- (b) **(Name)** County has been classified as attainment or unclassifiable for **(pollutant(s))**. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.
- (c) Fugitive Emissions **(optional)**

Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 or 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

**(Choose if the source is located in a nonattainment county)**

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. **(Name)** County has been designated as nonattainment for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3. See the State Rule Applicability for the source section.
- (b) **(Name)** County has been classified as nonattainment for **(pollutant(s))**. Therefore, these emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3. See the State Rule Applicability for the source section.
- (c) **(If applicable, indicate if the source is or is not located in the nonattainment portion of the county, such as the township.)**
- (d) Fugitive Emissions **(optional)**  
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 or 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

**Portable Source (use the following language for portable sources)**

- (a) Initial Location  
This is a portable source and its initial location is **(complete address, include no., street, city, state, zip code)**.
- [b] PSD and Emission Offset Requirements  
The emissions from this portable source were reviewed under the requirements of the Prevention of Significant Deterioration (PSD) 326 IAC 2-2 and Emission Offset 326 IAC 2-3.
- (c) Fugitive Emissions  
Since this type of operation is not one of the twenty-eight (28) listed sources under 326 IAC 2-2 or 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.
- (d) Local Agency **(optional)**  
Based on the initial location of this source, the **(local agency)** shall be contacted for additional air operating requirements. OAQ has the authority to issue this construction permit.

**Proposed Revision**

**(For existing minor source)**

PTE from the proposed modification (based on 8760 hours of operation per year at rated capacity including enforceable emission control and production limit where applicable):

Pollutant	PM (ton/yr)	PM-10 (ton/yr)	SO <sub>2</sub> (ton/yr)	VOC (ton/yr)	CO (ton/yr)	NO <sub>x</sub> (ton/yr)
Proposed Modification						
PSD or Offset Threshold Level	100 or 250	100 or 250	100 or 250	100 or 250	100 or 250	100 or 250

**(Choose if it is 100 or 250 tons/year. It cannot be both.)**

**(Use this for an attainment county)**

This modification to an existing minor stationary source is not major because the emission increase is less than the PSD major source levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

**(Use this for a nonattainment county)**

This modification to an existing minor stationary source is not major because the emission increase is less than the Emission Offset major source levels. Therefore, pursuant to 326 IAC 2-3, the Emission Offset requirements do not apply.

**Federal Rule Applicability**

**(Choose one of the following for NSPS)**

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) applicable to this source.

**or**

- (a) **(This source or The facility/unit)** is not subject to the requirements of the New Source Performance Standard, 326 IAC 12 (40 CFR 60.(number), Subpart (letter)), due to **(size, date of construction, etc.)**.

**and/or**

- (a) **(This source or The facility/unit)** is subject to the New Source Performance Standard, 326 IAC 12, (40 CFR 60.(number), Subpart (letter)). **(Summarize the requirements and/or limits.)**

**(example for 40 CFR Part 60.670-676, Subpart OOO)**

This limestone processing plant is subject to the New Source Performance Standard 326 IAC 12, 40 CFR 60.670 through 60.676, Subpart OOO. This rule requires the particulate emissions from:

- (a) the crushing operations to be limited to fifteen percent (15%) opacity or less, and  
(b) the screening and conveying operations to be limited to ten percent (10%) or less.

**(Choose one of the following for NESHAPs)**

- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP)(326 IAC 14, 20 and 40 CFR Part 61, 63) applicable to this source.

**or**

- [b] **(This source or The facility/unit)** is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), Subpart (xxx) due to **(size, date of construction, etc.)**.

**or**

- [b] **(This source or The facility/unit)** is subject to the National Emission Standards for Hazardous Air Pollutants, 326 IAC 20, (40 CFR 63.(number), Subpart (letter)). **(List the requirements and enclose a copy of the federal rule if the NESHAP has not applied to the source in the past.)**

The provisions of 40 CFR 63 Subpart A – General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the facility described in this section except when otherwise specified in 40 CFR 63 Subpart (xxx).

**(example for 40 CFR Part 63, Subpart N and 326 IAC 20-1-1, Chromium Electroplating)**

The chromium electroplating operations are subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 20, (40 CFR 63.340-347, Subpart N). Pursuant to 40 CFR 63, Subpart N and 326 IAC 20-8-1, the chromium electroplating operations are subject to the following conditions:

- (1) The surface tension of the chromium electroplating bath contained with the tank shall not exceed forty-five (45) dynes per centimeter at any time during the operation of the tank if a chemical fume suppressant containing a wetting agent is used to demonstrate compliance.
- (2) Each time that surface tension monitoring exceeds forty-five (45) dynes per centimeter, the frequency of monitoring must revert back to every four (4) hours of tank operation. After forty (40) hours of monitoring tank operation every four (4) hours with no exceedances, surface tension measurement may be conducted once every eight (8) hours of tank operation. Once there have been no exceedances during forty (40) hours of tank operation, surface tension measurement may be conducted once every forty (40) hours of tank operation on an ongoing basis, until an exceedance occurs.
- (3) An alternative emission limit of 0.01 milligram per dry standard cubic meter (mg/dscm) will be applicable if the chromium electroplating bath does not meet the limit above.
- (4) A summary report shall be prepared to document the ongoing compliance status of the chromium electroplating operation. This report shall be completed annually, retained on site, and made available to IDEM upon request. If there are significant exceedance of chromium air emission limits (as defined in 40 CFR Part 63.347(h)(2)), then semiannual reports shall be submitted to:  
  
Indiana Department of Environmental Management  
Air Compliance Branch, Office of Air Quality  
Chromium Electroplating  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206
- (5) The chromium electroplating operations shall be subject to the record keeping and reporting requirements as indicated in the chromium electroplating NESHAP.

**State Rule Applicability – Entire Source**

**(List all state rules that apply to the entire source. Also list any state rule which stipulate a numerical limit (include the limit) and/or all state rules which require compliance determination or compliance monitoring.)**

**(example)**

**(List Preventive Maintenance Plan only if it has been submitted to OAQ. A Preventive Maintenance Plan is not required to be submitted to OAQ.)**

**326 IAC 1-6-3 (Preventive Maintenance Plan)**

The source has submitted a Preventive Maintenance Plan (PMP) on **(date)**. This PMP has been verified to fulfill the requirements of 326 IAC 1-6-3 (Preventive Maintenance Plan).

**326 IAC 2-6 (Emission Reporting)**

This source is subject to 326 IAC 2-6 (Emission Reporting) because it has the potential to emit more than **(ten (10) tons per year (for specific counties) or one hundred (100) tons per year) of (pollutant)**. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by **(April 15 or July 1)** or each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

**(Use the following language when 326 IAC 2-6 does not apply)**

**326 IAC 2-6 (Emission Reporting)**

This source is located in **(Name)** County and the potential to emit of **(what pollutant)** is less than **(ten (10) or one hundred (100)) tons per year**. Therefore, 326 IAC 2-6 does not apply.

**326 IAC 5-1 (Visible Emissions Limitations)**

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in the permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

**State Rule Applicability – Individual Facilities**

**(List all state rule that apply to specific facilities. Also list any state rule which stipulate a numerical limit (include the limit) and/or all state rules which require compliance determination or compliance monitoring.)**

**(examples)**

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))

**If the rule applies:**

The operation of **XXXXX (describe)** will emit greater than 10 tons per year of a single HAP or 25 tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 will apply. **(Then explain what MACT is determined to be).**

**If the rule does not apply:**

The operation of **XXXXX (describe)** will emit less than 10 tons per year of a single HAP or 25 tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 6-3-2 (Process Operations)

Pursuant to **000-00000-00000** issued on **(month-day-year)**, **(remove “Pursuant to 000-00000-00000 issued on (month-day-year)” if this requirement was not previously listed in a construction permit)** the particulate matter (PM) from the **(facility)** shall be limited by the following:

**(Choose the appropriate equation)**

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

The **(control equipment)** shall be in operation at all times the **(facility)** is in operation, in order to comply with this limit.

**or**

Interpolation and extrapolation of the data for the process weight rate in excess of sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission is pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

The **(control equipment)** shall be in operation at all times the **(facility)** is in operation, in order to comply with this limit.

326 IAC 8-2-9 (Miscellaneous Metal Coating)

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of the coating delivered to the applicator at the **spray booth** shall be limited to **3.5** pounds of VOCs per gallon of coating less water, for **forced warm air dried coatings**.

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

Based on the MSDS submitted by the source and calculations made, the spray booth is in compliance with this requirement. **(This statement of compliance assumes that the source has submitted proof that this formulation data (e.g. MSDS) is consistent with Method 24. The source must do this before compliance can be determined.)**

**Testing Requirements**

**(Explain how the requirement for a test was determined to be necessary. Or explain why a test is not required. This can also be done on a calculation page.)**

**(example)**

PM Emissions from mixing and packing (J-4), bag dump (J-5), and conveying (J-6) are calculated as follows:

$$\begin{aligned}\text{J-4 Emissions} &= \text{Flow Rate} \times \text{Inlet Grain Loading} \times 60 \text{ min/hr} / 7000 \text{ gr/lb} \times (1-0.999) \\ &= 1170 \text{ acfm} \times 10 \text{ gr/acf} \times 60 \text{ min/hr} / 7000 \text{ gr/lb} \times (1-0.999) \\ &= 0.10 \text{ lb/hr}\end{aligned}$$

$$\begin{aligned}\text{J-5 Emissions} &= 545 \text{ acfm} \times 10 \text{ gr/acf} \times 60 \text{ min/hr} / 7000 \text{ gr/lb} \times (1-0.999) \\ &= 0.05 \text{ lb/hr}\end{aligned}$$

$$\begin{aligned}\text{J-6 Emissions} &= 1040 \text{ acfm} \times 10 \text{ gr/acf} \times 60 \text{ min/hr} / 7000 \text{ gr/lb} \times (1-0.999) \\ &= 0.09 \text{ lb/hr}\end{aligned}$$

At inlet grain loadings of 10 gr/acf and a collection efficiency of 99.9%, the outlet grain loading for all of these facilities will be 0.01 gr/acf. Assuming standard conditions prevail, the emissions from the dry texture paint facilities are less than the allowable grain loading limits. However, the facilities may not comply with the lb/hr limits. Therefore, stack tests will be required.

## Compliance Requirements

**(The following two paragraphs should be included in every FESOP TSD.)**

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

**(complete this section for each facility that has compliance monitoring conditions)**

1. The **(specify facility)** has applicable compliance monitoring conditions as specified below: **(list conditions)**

**(Examples – check applicability and compliance monitoring guidance)**

- (a) Daily visible emissions notations of the **shot blasting stack exhaust (specify facility)** shall be performed during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting start up or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an abnormal emissions is observed.
- (b) The Permittee shall record the total static pressure drop across the **baghouse** controlling the **shot blasting system**, at least one daily **(or once per shift)** when the **shot blasting system** is in operation. Unless operated under conditions for which the Preventive Maintenance Plan specifies

otherwise, the pressure drop across the **baghouse** shall be maintained within a range of **3.0 to 6.0** inches of water or a range established during the latest stack test. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when the pressure reading is outside of the above mentioned range of any one reading.

These monitoring conditions are necessary because **(explain – examples are shown below)**

The baghouse for the melting process must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-7 (Part 70).

**(repeat the above procedure for any othe facilities having applicable compliance monitoring conditions.)**

## **Conclusion**

The permit revision shall be added to the conditions of the FESOP as **000-00000-00000**.